<u>Iowa Balance of State Continuum of Care (CoC)</u> <u>DRAFT 2016 CoC Renewal Project Application Plan</u>

COMMENTS RECEIVED

Background:

On behalf of the Iowa Council on Homelessness, the Iowa Finance Authority invited comments on the DRAFT 2016 CoC Renewal Project Application Plan. Written comments were submitted by Friday, May 6, 2016. This document contains the comments received.

1) Carrie Dunnwald, Cedar Valley Friends of the Family:

- Under "Applicant Name and Location", would it be beneficial to provide any clarification on "Project Name" for programs that aren't utilizing ServicePoint? For example, "as listed on the HIC" or something?
- Under the "Performance" section, the last 2 bullets on #7 are worded to make it seem as if it is a requirement for CoC programs to be trained in SOAR or to only work with providers that are trained in SOAR. Is this a requirement now?
 - If not, I question the loss of 2 points on our application for not having staff trained in SOAR, though we connect with other entities that are able to help our clients navigate the SSDI/SSI process.
 - o If the TA is provided by a partner agency and they are not SOAR trained, will that also result in the loss of 2 points?
- Under the "Performance" section, question 12(a)-how would TH programs be classified in this question? Would they be classified as "remaining in permanent housing" or should the question be changed to reflect "remaining in housing program"?
- Under "Budget and Capacity" question #16, I would suggest being more specific on the 3 years (i.e. last 3 grant years, or since 2013, etc.).
- Under "Budget and Capacity" question #19, I would still incorporate leverage if this is required still by HUD.

RESPONSE:

- Project Name question is updated. The additional project name question was requested from ICA, for ServicePoint purposes in pulling periodic performance reports for the Research and Analysis Committee to review, as they have requested. Will help to have confirmation from ICA that this will still meet their purposes.
- The wording from Question 7 is pulled directly from HUD's 2015 Esnaps Project Application. The wording includes the option to work with a partner agency that is trained in SOAR.
- The wording for Question 12 has been adjusted slightly to reflect that TH projects should not count persons that haven't yet exited the program.

- The wording for Question 16 has been adjusted slightly per comments.
- Upon further discussion by CoC Committee, leverage section was removed entirely at this time. The problem is with timing: HUD only counts as leverage contributions/commitments that have been made within a specified time period once the NOFA is released. Therefore, earlier leverage commitments in place at the time of this application, may not be eligible for leverage in the actual application submitted to HUD. It's possible that points for leverage could be added in later on, after the NOFA is released, and this could potentially change the ranking.

2) Janet Walker, City of Dubuque:

In reviewing the Draft 2016 CoC Renewal Project Application, I do not see anything that would allow current projects that are applying for renewal funding to increase the funding amount. For the last couple of years, our City has contributed to the rents so that we may serve a minimum of 15 households; however, that will probably not be extended for this renewal application. The result will be downsizing the program rather than servicing more chronically homeless.

My comments then would be: Permanent Supportive Housing projects that utilize all aspects of the Housing First model should be provided the chance to increase the funding for the Renewal Project Application providing growth within the projects meeting both HUD goals and goals of the Iowa Balance of State Continuum of Care.

RESPONSE:

• HUD has typically not allowed renewal projects to increase their funding through the annual competition. Last year's NOFA was the first that this was broached as a possibility, but the CoC did not take it up with projects. If this is allowed in this year's NOFA, the CoC may consider this again.

3) Crissy Canganelli, Shelter House:

Recommendation: Provide detail on how to rank renewal of a project that has not been operational. For example, an agency may have a new project that is not yet under contract with HUD. The agency may be seeking renewal funding but does not have any outcomes related to the new project to report as the agency may still be operating the old project which may be an entirely different project type. Additionally, direction should be offered for agencies in this position as to how to respond to the individual questions (responses based on current operations or based on a yet to be implemented new project).

Recommendation: Require mandatory reallocation or face non-renewal of Transitional Housing and Supportive Services Only projects.

RESPONSE:

- A new section has been added to the application in the section called 2016 Project Scoring, Ranking, and Funding, which specifies the procedures for projects in this category.
- The CoC Committee discussed the distinction between transitional housing projects that serve a particular priority population as described by HUD for this project type (including DV, substance abuse, and youth), and transitional housing serving the general homeless population. A new question has been added to the proposed final application to assess points according to this distinction and other HUD priority project types. Beyond that, this is an issue that may need broader council/CoC input and discussion.

4) Mariliegh Fisher, Community Housing Initiatives:

Question 6a and 6b:

Is the check box the only response that you want answered? Are you expecting a brief explanation?

Question 7

Again, just using a check box, no explanations are required? The last check box regarding the staff person completing SOAR training within the last 24 months? Why does this have a time frame on it? What if someone has had the training and it wasn't within the last 24 months. Will they not receive any points? What if someone assisting the individual hasn't had training but has helped people receive their SSI/SSDI without the training?

BUDGET AND CAPACITY

Question 16

You don't speak about an agency that has had an audit and only 1 or 2 findings and they are resolved, do they get 2 points or 1? With audits, you can be compliant one time and not the next audit. It can depend on who does the audit sometimes. Also, HUD does change things on us.

Question 20

How exactly is this going to be scored? If unexpended funds are more than 2% then they get how many points? Do they get some for answering the questions or is it an all or nothing question? It appears that A through E is worth 5 points and F is worth 5 points. We know that 5 points will be given if all funds are expended, but how many points will be given if they aren't and an explanation is given. Is it left up to the discretion of the scorer? 2% seems like an odd number. Didn't it used to be higher?

HMIS PROJECTS

57% or 8 questions only require a yes or no answer or a percentage to receive points. Shouldn't they have to give brief response of some sort to get 3 points for an answer? (We know that they will be funded because HMIS is required.)

Question A. Currently requires a yes or no answer. Perhaps a date of the last time it was updated should have to be included. Worth 3 points

Question B. 3 yes or no answers required. Worth 3 points

Privacy Plan – yes or no – when was it implemented and when was it reviewed

Security Plan – yes or no

Question D – They will receive 3 points to put in a percentage. They only have to provide a brief narrative if the percentage is less than 25%. Worth 3 points

Question E – Again, they only have to put in a percentage unless it is over 10% and it shouldn't be because we aren't allowed to have over 5% missing or null values when we turn in our reports. Worth 3 points.

Question F – Yes or no required – Worth 3 points

Question G – Yes or no required – Worth 3 points

Question H – Yes or no – Worth 3 points

Question I – Yes or no – Worth 3 points

RESPONSE:

- Question 6a and 6b: Only the check box. This matches HUD Esnaps application.
- Question 7: Yes, only the check box. This matches HUD Esnaps application.
- Question 16: The language in the draft was "no more than three". This has been changed to "fewer" for clarity.
- Question 20: The application has been changed with a new proposed scoring formula for unexpended funds.
- HMIS projects: Many of the questions in the general project application are also yes/no or check-box questions. No changes are made in the proposed final application for this.

5) Tim Wilson, Home Forward Iowa:

Perhaps a version of the kind of table attached here could be inserted into the application. It asks the applicant to break down costs by category. I think we could provide some guidance but I'd have to take a look at last year's aps to get an idea. The columns leave the defining/justification up to the applicant. Again, I believe we could provide some examples but I also think that flexibility here is important.

Project Title:				
Describe each activity/category that funds are being requested to support. Activity 1:	Indicate the amount of CoC funding requested to support each activity or category listed.	Please outline how funding requested for each activity will be spent. Please categorize explanations by direct and indirect expenses.	Describe/defin e a unit of service for each or a combination of activities identified.	Provide the estimated cost for each unit of service identified.
Activity 2:				
Activity 3:				
Total Funding Requested	\$0			

RESPONSE:

• A version of this chart was added to the final proposed application.

6) David Hagen, HACAP:

[Comments submitted throughout the following copied sections of the application are retained in red font. Comments were reviewed by members of the Continuum of Care Committee, and several updates to the application were made throughout, based on consideration of some of the comments contained here. Some brief RESPONSES are provided at various points here. Some comments do not lend themselves to brief responses, and are beyond the scope of this COMMENTS and RESPONSES document. These comments are still retained for consideration by members of the Continuum of Care and the Iowa Council on Homelessness.]

PROJECT SUMMARY (1 point)

Expand point value with expanded discussion points. [Comment pulled out of margin for formatting purposes.]

- 1) Provide a description that addresses the entire scope of the proposed project.
- 2) Project includes counties served
- 3) Project includes local planning group(s) within the service area.
- 4) Project includes key community stakeholders that partner with organization.
- 5) Does the project utilize the VI-SPDAT assessment tools for individuals and families for service prioritization? (Potentially part of Program Design)

RESPONSE:

• This is intended as a very brief overview/orientation for reviewers for 1 point. No change suggested.

HOMELESS BED CONFIRMATION (1 point)

6) For Transitional Housing and Permanent Housing (PSH, S+C, or RRH) projects only: Open the 2016 Housing Inventory Chart (HIC) for the Iowa Balance of State; this will be available online here when the competition has opened: http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/107, in the section for the 2016 Competition. Which row on the HIC lists your project? How many total beds are listed for your project (Column U)? Is this correct? If your project is not listed in the HIC, STOP. Email amber.lewis@iowa.gov. Your project may not be eligible for the CoC program.

HOMELESS POPULATION (_points)

- 7) Provide a description of the local homeless population, including any subpopulations with special needs. Provide any specific client characteristics used for eligibility determinations.
- 8) Discuss how the grantee has worked with obtaining a local Point-in-Time count.
- 9) Have you identified any housing service gaps within your targeted service area? [Note: grantees that cannot answer these fundamental questions well may not be engaged with finding solutions to end homelessness in their service. Grantees that cannot answer these questions well may not understand their role in creating real solutions that address the homeless needs within the communities that they serve.]

PROJECT DESIGN (29 points) [Recommendation: scrap this question completely and refocus it for the grantee to explain why the selected their specific program designs in terms of:

- 1. The local homeless population needs
- 2. The targeted subpopulations in Opening Doors: how do they address chronic, family, youth and veteran homelessness; and how the implement Housing First into their design.
- 3. How they coordinate with other community stakeholders and housing providers
- 4. How they utilize the VI-SPDAT. How are they ensuring chronically homeless are being prioritized?
- 5. How they collaborate to support the local PiT count?

Note: No program realistically will serve all targeted subpopulations. Program design should reflect for whom they provide direct housing services and for whom other community housing service programs provide services to coordinate the community's solution to homelessness.

The Iowa Balance of State CoC has adopted HUD CPD 14-012, Notice on Prioritizing Persons Experiencing Chronic Homelessness in PSH:

https://www.hudexchange.info/resource/3897/notice-cpd-14-012-prioritizing-persons-experiencing-chronic-homelessness-in-psh-and-recordkeeping-requirements/. For PSH projects, also note that the Iowa Council on Homelessness voted in 2015 to require all PSH projects to prioritize all beds available through turnover to the chronically homeless.

- 10) Prioritization to end chronic homelessness: (10 points)
 - a. How many total units does your project have?
 - b. How many beds does your project have?
 - c. How many beds are listed in the 2016 HIC for your project as dedicated or prioritized for the chronically homeless? How does data about the local homeless population inform your project design, regarding chronically homeless (or other homeless subpopulations targeted by Opening Doors.
 - d. Given your answers to (a) and (b) above, what is the percentage of beds dedicated or prioritized for the chronically homeless?
 - e. Summarize your project's response to these questions on the 2015 CoC Project Application, and describe any differences between that application and this one.

Note: According to the HUD Competitive CoC e-mail messages, these are the HUD priorities:

In these *CoC Competition Focus* messages, we will cover the following policy priorities (as identified in the FY 2016 CoC Registration Notice):

- Creating a systemic response to homelessness (today's message)
- Strategically allocating resources
- Ending chronic homelessness
- Ending family homelessness
- Ending youth homelessness
- Ending veteran homelessness
- Using a Housing First approach

Only focusing on ending chronic homelessness is a failure in your application design. Furthermore, selection chronic homelessness in isolation is dangerous as it could shift the number of dedicated chronically homeless units – which ideally is a PSH housing strategy – beyond the underlying needs of the homeless populations in Iowa. Increasing the number of CH units without knowing the portion of CH statewide could lead to gaps of service for other homeless subpopulations.

Furthermore, this question realistically works against rapid rehousing programs as RRH targets people with lower acuity scores on the VI-SPDAT.

As a second priority population for CoC programs, HUD encourages communities to serve adults, youth, and families who are unsheltered and those accessing emergency shelter, before serving persons experiencing other forms of homelessness. More information on this and other priorities is available from a report released on July 23, 2014, for the Polk County Continuum of Care Board by Barbara Poppe and Associates (Barbara Poppe is the former director of the U.S. Interagency Council on Homelessness). This report is available on this page: http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/107.

- 11) Prioritizing those who are unsheltered or accessing emergency shelter:
 - a. Based on your most recent APR, how many participants entered the program as unsheltered or from an emergency shelter? How does this compare to the total number of participants that entered your program? (10 points)

Again, if we assume that each housing service type – ES, RRH, TH and PSH – is designed the specific needs of a certain homeless subpopulations, which can be sort via the use of a common assessment tool (the VI-SPDAT), why do we write an application that tries to move organization to attempt each type in a singular application?

I believe that we need to make Housing First practices, coordinated entry, closed with exception HMIS (since we are not ready to move to an open with exception system across the state), prioritization, program evaluation and monitoring as general operational procedures and practices for CoC-funded organizations, and take these out of the ranking of application.

We do not want to rank applicants based upon the quality of their grant writer; we want to be able to rank projects based upon their ability to house the homeless populations in their community.

HUD encourages programs to follow Housing First practices. The U.S. Interagency Council on Homelessness and HUD offer several resources regarding Housing First:

• Definition of Housing First: "Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing

without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry."

- Housing First/Rapid Rehousing Webinar: http://usich.gov/media_center/videos_and_webinars/hud-and-usich-core-principles-of-housing-first-and-rapid-re-housing-webinar.
- Housing First Checklist:
 <u>http://usich.gov/usich_resources/fact_sheets/the_housing_first_checklist_a_practical_too_l_for_assessing_housing_first_in.</u>
- HUD's SNAPS In Focus, "Why Housing First:" https://www.hudexchange.info/news/snaps-in-focus-why-housing-first/.

Check	s the project removed the following barriers to accessing housing and services? the box next to each item to confirm that your project has removed (or never had) is to program access related to each of the following (select all that apply): (9 total)
<u> </u>	Having too little or little income (all projects should check this; the Iowa Council on Homelessness voted in 2015 to prohibit CoC-funded projects from screening applicants out due to too little or no income); (1 point) Active or history of substance abuse; (1 point) Having a criminal record with exceptions for state-mandated restrictions; (1 point) Fleeing domestic violence (e.g., lack of a protective order, period of separation from abuser, or law enforcement involvement). (1 point) None of the above (click this if all of these barriers still exist) (no points).
, ,	es the project ensure that participants are not terminated from the program for lowing reasons? Select all that apply.
_ _ _	Failure to participate in supportive services; (1 point) Failure to make progress on a service plan; (1 point) Loss of income or failure to improve income; (1 point) Being a victim of domestic violence; (1 point) or Any other activity not covered in a lease agreement typically found in the project's geographic area. (1 point)

Again, if you have no tool in place to hold the applicant accountable to what they write in their grant, this comes back to who can write the best grant prose.

RESPONSE:

• The questions above match with HUD's 2015 Esnaps application. No changes suggested.

PERFORMANCE (36 points)

In July 2014, HUD released "Systems Performance Measures: An introductory guide to understanding system-level performance measurement." The guide can be found at this link: https://www.hudexchange.info/resources/documents/System-Performance-Measures-Introductory-Guide.pdf. Two key measures are:

- The percentage of adults who obtain or increase employment or non-employment cash income over time.
- The percentage of participants who obtain or increase non-cash mainstream benefits.

Our HMIS provider is still waiting for final implementation of the system measures for implementation. Once established we will be able to measure program performance from a systems approach. Until that can be implemented you need to be asking grantees how they are working to build community partnerships and collaborations to make a client-centered (not program-centered) CoC-wide entry and evaluation system possible.

RESPONSE:

Child Care

•	The questions below match with HUD's 2015 Esnaps application. No changes
	suggested.

13) Ide	entify whether the project includes the f	following activities	s: (10 points)		
	Transportation assistance is provided to clients to attend mainstream benefit				
_	appointments, employment training, or jobs? (2 points)				
	Use of a single application form for four or more mainstream programs? (2				
	points)				
	At least annual follow-ups with participants to ensure mainstream benefits are				
_	received and renewed? (2 points)				
u					
	the applicant, a subrecipient, or partne	• • •			
	The staff person providing the technic	al assistance comp	oleted SOAR training in		
	the past 24 months? (2 points)				
	` ' '				
14) Fo	r all supportive services available to par	rticinants indicate	who will provide them		
	11	•	<u> </u>		
no	w they will be accessed, and how often	they will be provi	ded: (10 points)		
	Assessment of Service Needs	select ▼	select		
•					
	Assistance with Moving Costs	select	select		
	Casa Managament	select 🔻	select		
,	Case Management	361661	361661		

-- select --

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Education Services	select ▼	select
Employment Assistance and Job Training	select ▼	select
Food	select ▼	select
Housing Search and Counseling Services	select	select
Legal Services	select ▼	select
Life Skills Training	select ▼	select
Mental Health Services	select ▼	select
Outpatient Health Services	select ▼	select
Outreach Services	select ▼	select
Substance Abuse Treatment Services	select ▼	select
Transportation	select ▼	select
Utility Deposits	select ▼	select

15) Budget request: (1 point)

a. What is the amount of this project's total 2015 grant from HUD?

16) Total persons served and total households served: (1 point)

a. How many total persons were served by your project during the most recently completed operating year (based on the most recent submitted APR)? How many households?

I would like this linked back to the total local homeless population and the portion of it that would most appropriately be served by their housing program type.

17) Based on responses to the prior two questions, what is the cost per person served? What is the cost per household served? Consider only the amount of your project's CoC grant, not matched or leveraged funds. What cost-per-person or cost-per-household factors should be considered for your program? (Please note again here the type of project—transitional, permanent supportive, supportive services only, or rapid rehousing.) (4 points)

If you are going to have this type of question, you need to ensure you have means tested costs for each type of housing service and adjustments based upon the supportive services provided to measure their response.

18) Exits to permanent destinations: (10 points)

a. Of these persons and/or households served, how many exited to permanent destinations (or remained in permanent housing)? What does this indicate about your program?

CONTINUUM OF CARE PARTICIPATION (12 points)

- 19) Annual Performance Report (APR) Submission: (2 points)
 - a. What is your project's operating year end date? APRs are due to HUD 90 days after the end of a project's operating year. On what date did you submit your most recently completed APR to HUD? On what date did you forward a copy of your APR to the Iowa Finance Authority? If an extension was granted, describe this.
- 20) Has any representative of your program been an active participant in the Iowa Council on Homelessness? (*Note that anyone can participate in council meetings even if not a voting member.*) Briefly describe. (**5 points**)

Or a local homeless planning group that reports to or coordinates with the Iowa Council on Homelessness.

RESPONSE:

- Question added regarding local homeless planning group.
- 21) Has any representative of your program been an active participant in Iowa Council on Homelessness committees and working groups? Briefly explain. (5 points)

BUDGET AND CAPACITY (17 points)

22) HUD Grant Monitoring: Check the box to describe any HUD CoC Project monitoring
results during the past three years (select only ONE option): (2 points)
☐ No monitoring visits from HUD (2 points);
☐ Monitoring visit(s) from HUD with no findings or concerns (2 points);
☐ Monitoring visit(s) from HUD with no more than three findings or concerns, all of
which have been resolved in the time requested by HUD (1 point);
☐ Monitoring visit(s) from HUD with more than three findings or concerns, and/or findings or concerns that were not resolved in the time requested by HUD (no points).
23) Verify that the amount requested for Administration Costs in the E-snaps Project Application will not exceed 7% (or the amount listed on the GIW, if a Renewal Project). Applications will not be approved if Administration Costs are greater than 7%. (1 point)
24) Is your agency drawing down CoC funds from HUD at least quarterly? Explain. (1 point)
25) Project leverage (3 points)

All eligible funding costs except leasing (which requires no match) must be matched with no less than a 25 percent cash or in-kind match. **Match** must be used for eligible activities as defined by the CoC Program Interim Rule. **Leverage** includes all funds, resources, and/or services that the applicant can secure to benefit clients served by the proposed project. HUD scores CoCs on the extent of their leverage.

	_	int:	
		25% match:	
	-	_	eatch: (1 point for committed
	_	<u> </u>	; 2 points for committed leverage
			ts for committed leverage at least
15	0% of the grant)		
Amou	nt	Source	Committed/Uncommitted?
should ref submitted a. Pr b. Ar	lect the most rece : (10 points) Dject operating ye mount of grant:	ntly-completed operating ar end date:	history as follows. All information g year for which an APR has been
	_	nexpended funds):	
			(5 points if less than 2%)
			in why, and explain how the project
		-	
		<u> -</u>	all funds. (5 points; projects
ex	penaing an tuna	s receive full 5 points)	

27) HMIS-only questions:

- a. Is the HMIS section of the Governance Charter up-to-date and accurate? (1 point)
- b. Are the following plans in place:
 - i. Privacy Plan? (1 point)
 - ii. Security Plan? (1 point)
 - iii. Data Quality Plan? (1 point)
- c. How are these plans reviewed by the CoC and HMIS Lead regularly? (3 points)
- d. How much of the total HMIS budget (not including required match) is supported through non-CoC Program cash or in-kind sources? If less than 25%, describe efforts to increase funding from non-HUD sources. (3 points)
- e. What was the percentage of null or missing values for the Universal Data Elements for the 2016 Point-in-Time count? If greater than 10%, describe steps to support the CoC in reducing null or missing values. (3 points)
- f. Do the existing HMIS Policies and Procedures include adequate procedures to ensure valid program entry and exit dates are recorded in HMIS? (3 points)
- g. Were PIT results reported to HUD in HDX by the 2016 deadline? (3 points)
- h. Does the HMIS Lead support the CoC in collecting and reporting accurate and quality subpopulation data for the sheltered homeless during the PIT? (3 points)
- i. Does the HMIS Lead support methods to reduce double-counting of the unsheltered homeless during the PIT count? (3 points)
- j. What is the current overall bed coverage rate for the CoC? Briefly describe steps to support the CoC in increasing the rate. (5 points)
- k. How does the HMIS Lead respond to identified HMIS-related CoC project needs (specific examples)? (10 points)
- 1. How does the HMIS Lead respond to identified HMIS-related CoC system needs (specific examples)? (10 points)
- m. How is the HMIS Lead supporting the move toward measuring CoC system performance (specific examples)? (10 points)
- n. How is the HMIS Lead supporting non-HMIS agencies in the CoC with data collection and reporting needs? (6 points)

Two items:

I. We cannot defund the HMIS Lead or we will cease to have HUD funds altogether. The HMIS Lead is an essential system component (like Coordinated Entry or priority lists that focus on ending homelessness for the previously mentioned subpopulations targeted by HUD.) Thus, I really question why the HMIS Lead needs to be ranked with other grantees. The HMIS Lead by design needs to be a collaborative entity that works with all of the awarded grantees to ensure quality and efficient data collection and reporting at a minimum. Maybe not for this NOFA round, but it would be nice to know what portion of CoCs fund their HMIS Lead by ranking them with all of their other applicants as we currently do.

Given the collaborative nature of the HMIS Lead, I would like two elements considered:

- 1) Does the HMIS Lead have a customer satisfaction process in place to ensure that they are meeting the needs of the housing service providers as they develop solutions for local homeless populations?
- 2) What is their vision on a highly functioning CoC and what is their role in making that happen? Data and results need to inform all that we do. Our HMIS Lead can be a critical partner in how we bring the BoS CoC together. We want to make sure we have an HMIS provider is working alongside the providers to find the best solutions possibly for the Iowans unfortunate enough to find themselves homelessness.

Lastly, I think the CoC committee should look at the ESG application as I believe it is the stronger of the two and may have questions that better address the needs of the continuum.